

REMARKS

Claims 30 and 25 have been amended to overcome the outstanding objection and § 112 rejection. Withdrawal is respectfully requested.

Claims 23-25 and 28-32 stand rejected under § 103 on the basis of Kadota et al. '550 and Ikeda et al. '172. Applicants traverse this rejection because there is no motivation or suggestion to modify and combine the cited references to derive the present invention.

Kadota et al. describe a display, and Ikeda et al. is directed to a tablet integrated display. While these products have some features in common, they have significant differences, as well, including the tablet electrode layer and related layers in Ikeda et al. Moreover, tablet displays have some unique problems and concerns not present in non-tablet displays. Ikeda et al. addresses one of these unique problems, reduction of parallax for finding a target accurately with a pen.

The present invention is a non-tablet display that is relatively lightweight, yet reliable. See page 33, lines 5-11 of the present specification. Parallax is not a problem in the present invention, so one of ordinary skill would not look to a tablet display to produce the lightweight and reliable non-tablet display defined in claim 23.

Kadota et al. also does not address the problems solved by applicants. Kadota et al. address problems relating to sputtering damage to the color filter and contamination of the liquid crystal by the color filter. Col. 1, line 62 - Col. 2, line 15. One of ordinary skill addressing weight and reliability problems in non-tablet displays would not look to Kadota et al. for a solution. More importantly, one of ordinary skill would not expect a combination of

selected features from Kadota et al. and Ikeda et al. to address the weight and reliability problems solved by the present inventors.

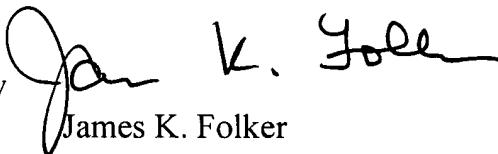
The examiner is using hindsight to reconstruct the present invention from various features of unrelated references, without showing a suggestion or motivation to modify and combine these references to obtain the present invention. Considering the differences between the products in the cited references and the problems addressed, an explicit suggestion should be found in the cited references to establish a *prima facie* case of obviousness. Since such a suggestion is not present, reconsideration and withdrawal of this rejection is respectfully requested.

Claims 26 and 27 stand rejected under § 103 on the basis of Kadota et al., Ikeda et al. and Kurematsu et al. '318. Applicants traverse this rejection for the reasons given with respect to the rejection of independent claim 23.

For the foregoing reasons, applicants believe that this case is in condition for allowance, which is respectfully requested. The examiner should call applicants' attorney if an interview would expedite prosecution.

Respectfully submitted,

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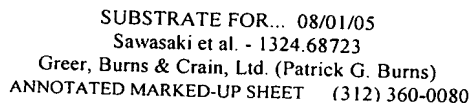
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In the Drawings:

The attached sheets of drawings include changes to Figs. 35-41. Annotated sheets showing the changes are attached. The replacement sheets contain the words “Prior Art” and replace the originally filed sheets.



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FIG.34A

FIG.34B

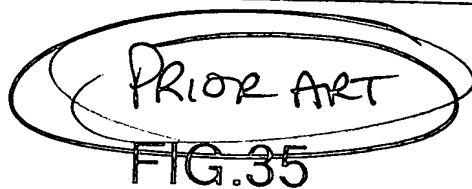
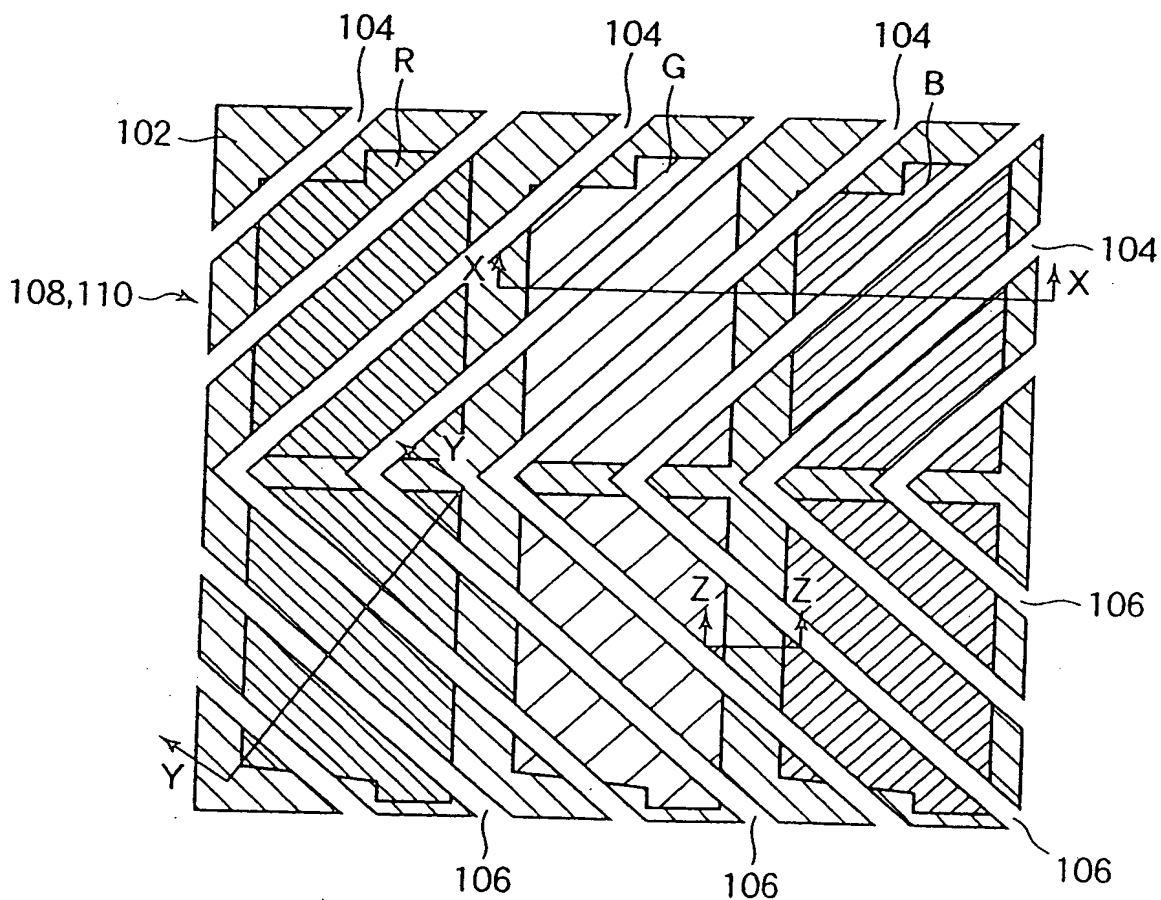
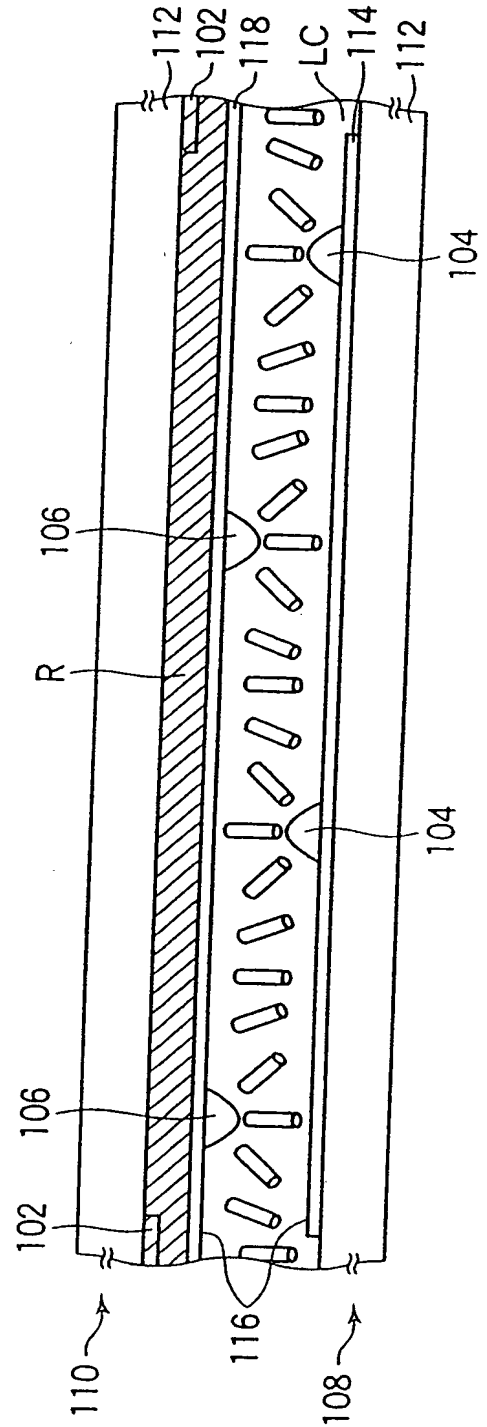


FIG. 35

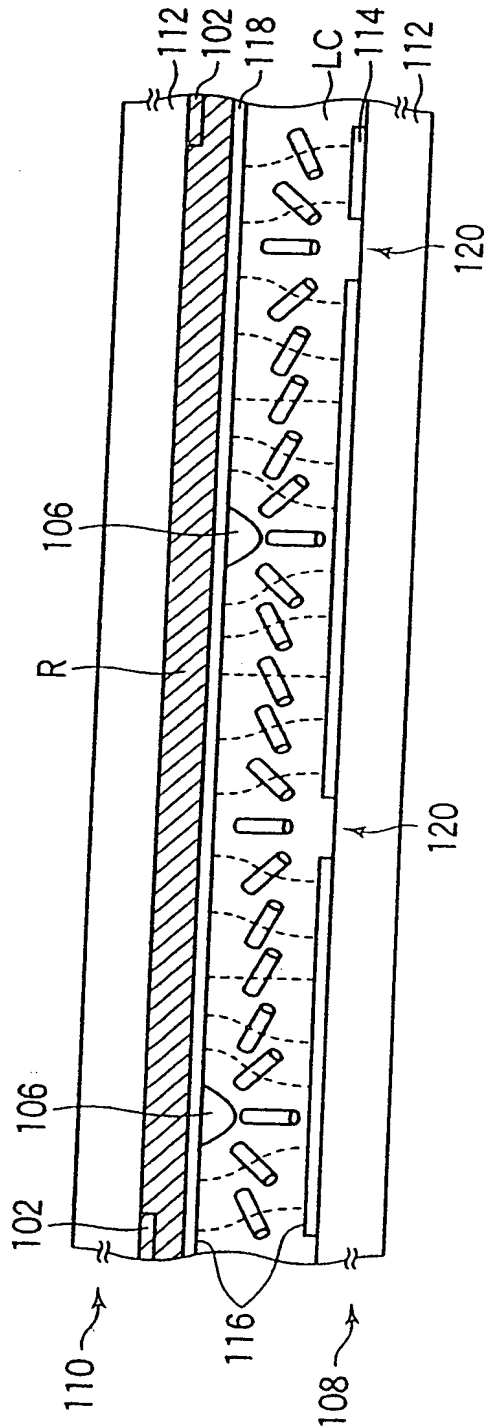






Prox Act

FIG. 40



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Prose Art
 FIG. 41

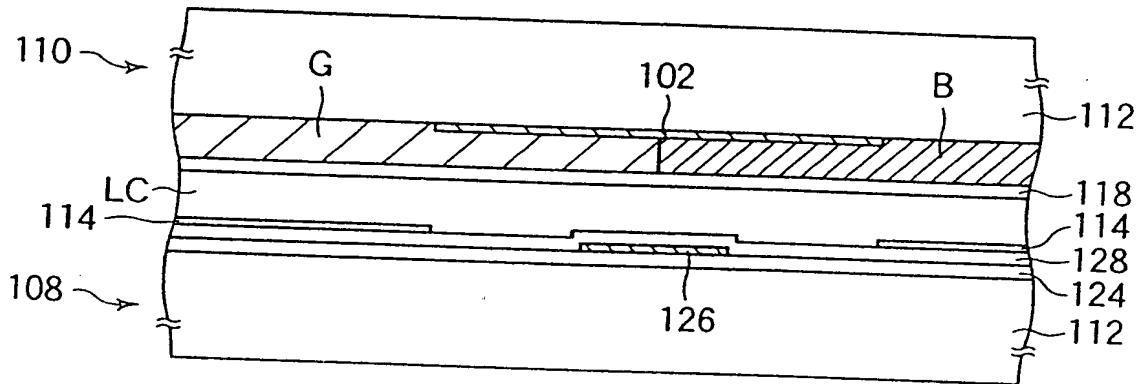


FIG. 42

